

Consideration of Comments on Re-ballot for Removal of WECC Waiver from INT-001 and INT-004

Summary Consideration: There was a single comment submitted with a negative ballot for the removal of the WECC Tagging Dynamic Schedules and Inadvertent Payback Waiver. The negative comment suggested that the tools and procedures are not in place to ensure compliance with INT-001 and INT-004 without this waiver. WECC believes that the tools and procedures are in place and no changes were made to the request to withdraw this waiver.

Segment:	3
Organization:	Public Utility District No. 2 of Grant County
Member:	Greg Lange
Comment:	The necessary tools and procedures are not in place in the Western Interconnection to ensure compliance without the waiver.
Response: The necessary tools and procedures are currently in place to ensure compliance in the Western Interconnection without the waiver. For example, with the WIT	

Response: The necessary tools and procedures are currently in place to ensure compliance in the Western Interconnection without the waiver. For example, with the WIT implementation on January 24, 2007, all transactions, including dynamic schedules, are required to be e-Tagged. As for Inadvertent Payback schedules, this waiver was needed prior to our current procedures that are in place with the Western Automatic Time Error Correction (ATEC) standard that has been submitted to NERC for approval. Even though the ATEC standard is not mandatorily enforceable at this time, it is a WECC Board approved criteria, and as such all entities in the WECC are expected to comply.

Segment:	5
Organization:	AEP Service Corp.
Member:	Brock Ondayko
Comment:	AEP's abstain vote is based on the understanding this regional difference only applies to dynamic schedules in WECC and does not apply to dynamic schedules that cross into other Interconnect regions.
Response: The waiver did impact only WECC.	
Segment:	9
Organization:	California Energy Commission
Member:	William Mitchell Chamberlain
Comment:	FERC disapproved this waiver and WECC has taken steps to make it no longer necessary. Approval of this is a mere formality at this point.
Response: Agreed.	